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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE  
TRUJILLO, WILLIAM BYATT, JEREMY  
DAVIS, and CHRISTOPHER CASTILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]  
ORDER FURTHER EXTENDING TIME  
FOR GOOGLE TO SUBMIT  
DECLARATION IN SUPPORT OF  
PLAINTIFFS' MOTION TO SEAL (DKT.  
429)**

Referral: The Honorable Susan van Keulen

Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on February 26, 2022, Plaintiffs filed their Administrative Motion To Consider Whether Portions Of Plaintiffs’ Request For Order To Show Cause Re: Sanctions For Google’s Discovery Misconduct (“Motion to Seal”) (Dkt. 429);

WHEREAS, on February 26, 2022, Google received unredacted copies of Plaintiffs’ Motion to Seal and exhibits, approximately 25 of which were designated to be sealed and submitted with Dkts. 429, 430;

WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the Designating Party to Plaintiffs’ Motion to Seal (Dkt. 429), to establish that such designated material is sealable, was Saturday, March 5, 2022;

WHEREAS, the Parties agreed on, and the Court approved, an extension of time to March 16, 2022 for Google to respond to Plaintiffs’ Motion to Seal (Dkt. 448);

WHEREAS, the Parties agree that an additional extension of seven days will provide Google with sufficient time to respond to Plaintiffs’ Motion to Seal (Dkt. 448)

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 429), to March 23, 2022.

DATED: March 15, 2022

QUINN EMANUEL URQUHART &  
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BOIES SCHILLER FLEXNER LLP

/s/ Andrew H. Schapiro

/s/ Mark Mao

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*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 429). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: March 15, 2022

By /s/ Andrew H. Schapiro  
Andrew H. Schapiro  
*Counsel on behalf of Google*

**[PROPOSED] ORDER**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 429), shall be extended to March 23, 2022.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE SUSAN VAN KEULEN  
United States Magistrate Judge